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March 4, 2025

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, N.J. 07102

Re: United States v. Coburn and Schwartz, 19-cr-120 (MEF)

Dear Judge Farbiarz:

We write on behalf of defendant Gordon J. Coburn, joined by counsel for co-defendant Steven Schwartz, in response to the Court's Order at ECF No. 963. Defendants agree with the government's first statement that there are 60 days remaining on the "clock" under the Speedy Trial Act. ECF No. 962. As to the second statement, the pretrial motion referenced by the government was filed *ex parte* by the government and Debevoise & Plimpton LLP, *see* ECF No. 926 at 2, and, as such, Defendants are not presently aware of its status, but accept the government's representation that their pretrial motion remains pending and tolls the Speedy Trial "clock." In any event, Defendants believe that the Speedy Trial "clock" is currently tolled to March 17, 2025, for reasons discussed at this morning's conference. *See* 18 U.S.C. § 3161(h)(4); ECF No. 961.

Finally, and to the extent relevant to the Court's Speedy Trial Act analysis, Defendants are prepared to consent to any tolling of the Speedy Trial "clock" to allow time for the review contemplated by the letter submitted by the United States, ECF No. 956.

Respectfully submitted,

/s/ James P. Loonam
James P. Loonam

cc: All Counsel of Record (*via ECF*)